

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	
	§	CASE NO. 1:20-10410-HCM
3443 ZEN GARDEN, L.P.	§	
	§	Chapter 11
DEBTOR.	§	

**CHAPTER 11 TRUSTEE’S (1) OBJECTION TO CLAIM NO. 12-2 ON THE CLAIMS
REGISTRY OF HINSHAW & CULBERTSON LLP WITH NOTICE THEREOF AND
(2) MOTION TO DETERMINE VALUE OF PROPERTY SECURING CLAIM**

This is an objection to your claim in this bankruptcy case. This objection asks the Court to disallow (eliminate), reduce, or modify your claim as set forth in this objection. If you do not file a written response to this objection within 30 days from the date of mailing of this objection, the Court may disallow (eliminate), reduce, or modify your claim as set forth in this objection, without a hearing being held.

Any response to this objection must explain your position and be timely filed with the United States Bankruptcy Clerk, Western District of Texas, Homer J. Thornberry Federal Judicial Building, 903 San Jacinto Blvd., Suite 322, Austin, TX 78701. If a timely response is filed, the Court will then set a hearing on the objection and you will be provided with notice of the date, time, and place of the hearing. If you do not attend the hearing, the Court may decide that you do not oppose the objection to your claim.

Gregory S. Milligan, Chapter 11 Trustee (the “Trustee”) of the bankruptcy estate (the “Estate”) of 3443 Zen Garden, L.P. (the “Debtor”) in the above-captioned chapter 11 case, hereby files this (1) Objection (the “Objection”) to the claim in the amount of \$323,222.04 (the “Claim”) of Hinshaw & Culbertson LLP (the “Claimant”) seeking entry of an order substantially in the form attached hereto as Exhibit A, disallowing the Claim as a secured claim against property of the Estate and (2) determining the value of property securing the Claim to be \$0. In support hereof, the Trustee respectfully states as follows:

I. INTRODUCTION

1. The Trustee objects that the Claim asserts a secured claim against the Estate despite the Claimant's lack of any interest in property with value held by the Estate to secure the Claim. As detailed below, to the extent the Claimant asserts a lien on the Estate's interest in legal files, such interest has no meaningful Estate property value to secure the Claims. The Court should either disallow the secured portion of the Claim or value the secured portion of the Claim at \$0, without prejudice to allowance of the Claim as an unsecured claim.

II. JURISDICTION & VENUE

2. This Court has jurisdiction over the subject matter of this Application pursuant to 28 U.S.C. §§ 1334 and 157. This is a core proceeding under 11 U.S.C. § 157(b)(2)(A). Venue is proper according to 28 U.S.C. §§ 1408 and 1409.

III. FACTUAL BACKGROUND

A. The Case

3. Certain petitioning creditors initiated the above-captioned bankruptcy case (the "Case") by filing an involuntary chapter 11 petition on March 22, 2020 (the "Petition Date"). This Court entered its *Consent Order for Entry of Relief* on April 8, 2020. ECF No. 11. The Court appointed the Trustee on April 22, 2020. ECF No. 36.

4. Throughout the case, the Trustee has served documents and pleadings on Hinshaw & Culbertson LLP at the following address: 151 North Franklin St., Ste. 2500, Chicago, IL 60606-1915.

B. The Trustee's Review of Claims, including the Claim

5. The Trustee and his professionals have worked diligently to review the claims listed on the Debtor's bankruptcy schedules and statement of financial affairs (ECF No. 48, the

“Schedules”) as well as the proofs of claim filed on the claims register for the Case (the “Claims Register”). For the reasons set forth herein, the Trustee has determined that the Claim should be disallowed as a secured claim because there is no Estate property to which the Claim is properly attached, or alternatively, any Estate property in which the Claimant has an interest should be valued at \$0.

C. The Claim

6. The Debtor’s Schedule F lists Hinshaw & Culbertson as a creditor holding an unsecured claim in the total amount of \$339,734.24. *See* ECF No. 48, Schedule F, Claim No. 3.17.

7. The Claimant subsequently filed a proof of claim (the “Original Proof of Claim”) on the claims register in the Case which was designated as Claim Number 12-1 and alleges a secured claim in the amount of \$323,222.04. The Original Proof of Claim alleges that the Claim is secured by a lien on “Files”, including “all documents, electronically stored information, work product and any other tangible thing generated by Claimant with respect to the Debtor” and certain affiliates and related entities (the “Files”). *See* Claims Register, Proof of Claim No. 12-1, Item 9 and Addendum, ¶ 5.

8. The Claimant subsequently filed a proof of claim (the “Amended Proof of Claim”) on the claims register in the Case which was designated as Claim Number 12-2 and alleges a secured claim in the amount of \$323,222.04. The Proof of Claim alleges that the Claim is secured by a lien on “Files”, including “all documents, electronically stored information, work product and any other tangible thing generated by Claimant with respect to the Debtor” and certain affiliates and related entities. *See* Claims Register, Proof of Claim No. 12-1, Item 9 and Addendum, ¶ 5.

9. The Trustee seeks disallowance of the Claim as a secured claim or valuation of the secured portion of the Claim at \$0, without prejudice to allowance of the Claim as an unsecured claim.

IV. OBJECTION AND RESERVATION OF RIGHTS

A. **Objection to Claim**

10. Section 502 of the Bankruptcy Code provides, in pertinent part, as follows: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a).

11. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes prima facie evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). Additionally, claimants in this case are entitled to rely on the Schedules as prima facie evidence of the validity and amount of the claims of creditors, unless they are scheduled as disputed, contingent, or unliquidated, according to Bankruptcy Rule 3003(b). A proof of claim loses the presumption of prima facie validity if an objecting party refutes at least one of the allegations that is essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

12. Here, the Trustee objects that the property Claimant asserts secures the Claim has no value. The Files do not have any value to the Estate and the Estate cannot generate any value

for the Files through liquidation. The Trustee seeks for the Court to disallow the secured portion of the Claim without prejudice to its allowance as a general unsecured claim.

B. Valuation of Estate Property Securing Claim

13. A party in interest may request and after notice to the holder of the claim and a hearing, the court may determine the amount of a secured claim under § 506(a) of the Bankruptcy Code. Fed. R. Bankr. P. 3012. When a debtor or trustee seeks to extinguish a lien, in addition to disallowing a claim, a motion is sufficient when the basis to avoid the lien is valuation under section 506(a) of the Bankruptcy Code. *In re Kleibrink*, 346 B.R. 734, 749 (Bankr. N.D. Tex. 2006), *affirmed sub nom Kleibrink v. Kleibrink (In re Kleibrink)*, 2007 WL 2438359 (N.D. Tex. 2007), *affirmed* 621 F.3d 370 (5th Cir. 2010).

14. By this Objection, the Trustee seeks for the Court to determine the value of any Estate property securing the Claim, including the Files, to be \$0 and thereby for the value of the secured portion of the Claim to be \$0.

15. The Claimant asserts that the Claim may be secured by the Files. However, as explained above, because of the Files do not have any value to the Estate, the property allegedly securing the Claim has no value, and the Trustee seeks for the Court to determine the value of the property securing the Claim to be \$0, without prejudice to the Claim's allowance as an unsecured claim against the Estate.

16. The Trustee reserves the right to assert any other objections, defenses, and counterclaims to the validity, liability and amount of the Claim, including any unsecured portion of the Claim Claimant asserts.

V. CONCLUSION

WHEREFORE, the Trustee respectfully requests that this Court enter an order: (i) granting the Objection; (ii) disallowing the secured portion of the Claim without prejudice to allowance of the Claim in whole or in part as a general unsecured claim; (iii) determining the value of the property securing the Claim, if any, at \$0 without prejudice to allowance of the Claim in whole or in part as a general unsecured claim; and (iv) granting such other and further relief to which the Trustee may be entitled at law or in equity.

Dated: December 31, 2020

/s/ Scott D. Lawrence

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**COUNSEL FOR GREGORY S. MILLIGAN,
CH. 11 TRUSTEE FOR 3443 ZEN GARDEN, L.P.**

CERTIFICATE OF SERVICE

I certify that on December 31, 2020, a true and correct copy of the forgoing was served on the parties listed on the attached service list, either via ECF or United States First Class mail as indicated therein, including the following addresses for Claimant, which were served via United States First Class Mail:

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Hinshaw & Culbertson LLP
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Hinshaw & Culbertson LLP
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Dallas, TX 75201

/s/ Scott D. Lawrence

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE: 3443 ZEN GARDEN, L.P. DEBTOR.	§ § § § §	CASE NO. 1:20-10410-HCM Chapter 11
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**ORDER GRANTING CHAPTER 11 TRUSTEE’S (1) OBJECTION TO
CLAIM NO. 12-2 ON THE CLAIMS REGISTRY OF
HINSHAW & CULBERTSON LLP WITH NOTICE THEREOF AND
(2) MOTION TO DETERMINE VALUE OF PROPERTY SECURING CLAIM**

The Court has considered the Objection (the “Objection”) to Claim No. 12-2 of Hinshaw & Culbertson LLP on the Claims Registry for the above-captioned case (the “Chapter 11 Case”), with notice thereof, and motion to determine value of property securing claim, filed by Gregory S. Milligan, Chapter 11 Trustee (the “Trustee”) of the bankruptcy estate (the “Estate”) of 3443 Zen Garden, L.P. (the “Debtor”), the chapter 11 debtor in the Case. The Court finds that (i) it has jurisdiction over the matters raised in the Objection pursuant to 28 U.S.C. §§ 157 and 1334; (ii) the Objection is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in

the Objection is in the best interests of the Estate and its creditors; (iv) proper and adequate notice of the Objection and the hearing thereon has been given and that no other or further notice is necessary; and (v) upon the record, after due deliberation, good and sufficient cause exists for the granting of the relief requested in the Objection as set forth herein. IT IS HEREBY ORDERED THAT:

1. The Objection is sustained as set forth herein.
2. The claim of Hinshaw & Culbertson LLP described on the claims register maintained by the clerk of the Bankruptcy Court for the Chapter 11 Case as claim number 12-2 is disallowed as a secured claim and is deemed asserted as a general unsecured claim against the Estate without prejudice to further objection by the Trustee or any party in interest.
3. The Clerk of the Court is authorized and directed to update the claims register maintained in the Chapter 11 Case to reflect the relief granted in this Order.
4. The value of the property, if any, securing the claim of Hinshaw & Culbertson LLP described on the claims register maintained by the clerk of the Bankruptcy Court for the Chapter 11 Case as claim number 12-2 is determined to be \$0.
5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against the Estate; (b) a waiver of any party's right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by the Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Trustee's or Estate's rights under the Bankruptcy Code or any other applicable law.

PREPARED AND SUBMITTED BY:

**COUNSEL FOR GREGORY S. MILLIGAN,
CH. 11 TRUSTEE FOR 3443 ZEN GARDEN, L.P.**

Trustees Objection to Claim 12-20114 Inshaw & Culbertson Pg 11 of 14

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